

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE BANCO BRADESCO S.A.
SECURITIES LITIGATION

Civil Case No. 1:16-cv-04155 (GHW)

ECF CASE

**NOTICE OF LEAD COUNSEL’S MOTION FOR AN AWARD OF
ATTORNEYS’ FEES AND PAYMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court’s Order Preliminarily Approving Settlement and Providing for Notice entered July 24, 2019 (ECF No. 197), and upon (i) the Declaration of Johnston de F. Whitman, Jr. in Support of (I) Lead Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of Allocation and Certification of Settlement Class to Effectuate the Settlement; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses and the exhibits thereto (“Whitman Declaration”); (ii) the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses (“Memorandum”); and (iii) all other papers and proceedings herein, Court-appointed Lead Counsel Kessler Topaz Meltzer & Check, LLP, on behalf of Plaintiffs’ Counsel, will and do hereby move this Court, before the Honorable Gregory H. Woods, on November 13, 2019 at 4:15 p.m., in Courtroom 12C of the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, NY 10007, or at such other location and time as set by the Court, for entry of an Order awarding attorneys’ fees and expenses. A proposed Order granting the requested relief will be submitted with Lead Counsel’s reply submissions after the deadline for objecting to the motion has passed.

As explained in more detail in the accompanying Whitman Declaration and Memorandum, Lead Counsel respectfully requests that the Court approve an award of attorneys' fees in the amount of 25% of the \$14.5 million Settlement Amount, plus interest. That requested amount would be allocated as follows: (i) 72% to Lead Counsel Kessler Topaz Meltzer & Check, LLP; (ii) 18% to Liaison Counsel Labaton Sucharow LLP; and (iii) 10% to Gadow Tyler, PLLC. Lead Counsel further requests that the Court award reimbursement of Plaintiffs' Counsel's expenses in the amount of \$743,507.30. Finally, Lead Counsel respectfully requests reimbursement to Lead Plaintiff and Boilermaker-Blacksmith National Pension Trust as follows: \$37,638.75 to Lead Plaintiff Public Employees' Retirement System of Mississippi; and \$7,605.61 to Boilermaker-Blacksmith National Pension Trust, for an aggregate of \$45,244.36.

Dated: October 8, 2019

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

/s/ Johnston de F. Whitman, Jr.

Andrew L. Zivitz
Johnston de F. Whitman, Jr.
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

*Lead Counsel for Lead Plaintiff and the
Settlement Class*

LABATON SUCHAROW LLP

Johnathan Gardner
Alfred L. Fatale III
140 Broadway
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

*Liaison Counsel for Lead Plaintiff and the
Settlement Class*

GADOW TYLER, PLLC

Jason M. Kirschberg

511 E. Pearl Street

Jackson, MS 39201

Telephone: (601) 355-0654

Facsimile: (601) 510-9667

Additional Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

/s/ Johnston de F. Whitman, Jr.
Johnston de F. Whitman, Jr.